

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

IN RE
Mining Project Wind Down Holdings,
Inc.

DEBTOR

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Case No. 22-90273 (MI)

Chapter 11

DEBTOR'S WITNESS AND EXHIBIT LIST

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION	
Main Case No: 22-90273	Name of Debtor: Mining Project Wind Down Holdings, Inc.
Adversary No: N/A	Style of Adversary: N/A
WITNESSES: Patrick Donohue	Judge: Marvin Isgur
	Courtroom Deputy: Ana Castro
Any witness listed or called by any other party;	Hearing Date: January 10, 2025
Rebuttal witnesses as necessary; and	Hearing Time: 9:00 a.m.
Debtor reserves the right to cross-examine any witness called by any other party.	Party's Name: Relm Insurance, Ltd. and Banyan Risk, Ltd.
	Attorney's Name: Bennett G. Fisher
	Attorney's Phone: 346-241-4095
	Nature of Proceeding: Motion for Relief from Stay to Permit Proceeds of Insurance to Pay Defense Costs (Doc. 1451).

EXHIBITS

Ex. #	Description	Offered	Objection	Admitted /Not Admitted	Disposition
1	Motion to Lift Stay by Relm and Banyan (Doc 1451)				
2	Joinder Motion by Nine Insureds to Lift Stay (Doc 1456)				
3	Joinder Motion of David Perrill (Doc 1458)				
4	Relm Insurance Policy				
5	Banyan Insurance Policy				
6	Supplemental Exhibit B (Doc 1472-1)				
7	Rebuttal (Doc 1466)				
8	Any document or pleading filed in the above captioned main case				
9	Any exhibit necessary for impeachment and/or rebuttal purposes				
10	Any exhibit identified or offered by any other party				

Dated: January 9, 2025

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH

/s/ Bennett G. Fisher

Bennett G. Fisher

TBA # 07049125

bennett.fisher@lewisbrisbois.com

24 Greenway Plaza, Suite 1400

Houston, Texas 77046

(713) 659-6767 | Telephone

(346) 241-4095 | Direct

(713) 759-6830 | Fax

**ATTORNEYS FOR RELLM
INSURANCE, LTD. AND BANYAN
RISK, LTD**

CERTIFICATE OF SERVICE

I certify that the foregoing has been served in accordance with LBR 9013(f) and Fed. R. Bankr. P. 7004(b) on January 9, 2025, to all parties who have filed a notice of appearance or request for notice in the case.

/s/ Bennett G. Fisher

Bennett G. Fisher